

Bartell, Jeremy L.

From: Savery, Donald J.
It: Friday, May 05, 2006 5:01 PM
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Subject: Biopure Securities Litigation

Counsel:

Please provide dates during the week of May 29, 2006 (due to the Monday holiday, starting on Tuesday, May 30 through Friday, June 2) for depositions of the named plaintiffs.

I believe responses to Biopure's discovery requests are due May 19, 2006. As you know, we are on a tight timeline given the class certification discovery cutoff of June 9. Accordingly, please confirm that we will receive on May 19, 2006 plaintiffs' written responses to the discovery requests and copies of all documents that plaintiffs will be producing in response to those requests. Particularly given Biopure's timely production of well over 30,000 pages of documents last week, we do not anticipate that plaintiffs will have any difficulty making their production on May 19, 2006, but we would like you to confirm.

Thank you.
Don

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